

February 5, 2020

Annette Vietti-Cook, Secretary U.S. Nuclear Regulatory Commission

Washington, D.C. 20555-0001

cc: NYS Attorney General Letitia James, Ulster County Executive Patrick Ryan

Re: Indian Point license transfer application to Holtec International to decommission Indian Point Nuclear Power Plant: NRC-2020-0021

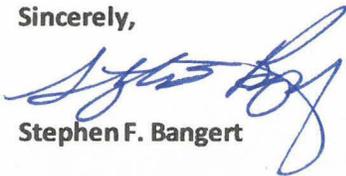
Dear Madame Vietti-Cook:

An application is before the NRC to transfer Entergy's license to operate and decommission the Indian Point Nuclear Power Plant to Holtec International. I have read several pieces in the media about this transfer, and I come away from those pieces very, very concerned and uneasy about the capability of Holtec to successfully complete the decommissioning. Holtec has entered into this arena with a probable lack of experience, managerial capacity, and questionable capitalization to successfully carry out this and possibly up to five other decommissionings. Learning how to do the applications, and doing the actual decommissionings are two entirely different things. These projects take place over many years, and being prepared both professionally and financially for the unexpected events and circumstances are critical to a successful and safe decommissioning.

I have had years of experience as a team member analyzing sizable commercial loan applications, and over the years I have seen time and time again applications by ambitious, unexperienced, short-sighted entrepreneurial applicants who have been undercapitalized. These nuclear power plants are no place for rookies to get their experience. Why and how do these operators think they can safely close these plants faster than the current operators? The decommissioning trust fund nest egg of \$60B is a mighty tempting target for folks who seem to be shooting from the hip. If it doesn't seem to make sense, it probably doesn't make sense.

I urge the NRC to allow for public hearings in New York State on this application, and let the light of day shine on this hand-off of immense responsibility.

Sincerely,



Stephen F. Bangert

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